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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

**RESERVATION OF RIGHTS IN CONNECTION WITH
STATEMENT AND APPLICATION OF THE PRIVATE INSURANCE
CLASS CLAIMANTS CONCERNING DISCOVERY DISPUTES**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

The Raymond Sackler Family,² by and through its undersigned counsel, hereby submits this reservation of rights with respect to the April 29, 2020, statement and application under Bankruptcy Rule 2004 [ECF No. 1099] (the “**Statement and Application**”) of the Private Insurance Class Claimants.³

The Court has scheduled a hearing to be heard on May 1, 2020 at 2:00 pm to consider, among other things, certain discovery disputes between the Official Committee of Unsecured Creditors and the Raymond Sackler Family (the “**UCC Discovery Hearing**”). On April 29, 2020, the Private Insurance Plaintiffs filed the Statement and Application. The Statement and Application contains numerous factual allegations that are false. The Private Insurance Plaintiffs are not a party to the discovery disputes to be considered at the UCC Discovery Hearing. By its Statement and Application, the Private Insurance Plaintiffs seek for themselves separate relief under Rule 2004 and request that its Statement and Application be considered at the May 21, 2020 omnibus hearing (the “**May 21 Hearing**”). Statement and Application ¶ 50. The Raymond Sackler Family has no objection to the consideration of the Statement and Application at the May 21 Hearing and will respond timely to those allegations in advance of the May 21 Hearing. To the extent that the Statement and Application was submitted also in connection with the UCC Discovery Hearing, the Raymond Sackler Family submits the allegations contained in the Statement and Application are not pertinent to the issues to be considered by the Court at that UCC Discovery Hearing and reserves all rights with respect to the Statement and Application, the allegations contained therein, and the relief sought by the Private Insurance Plaintiffs.

² The Raymond Sackler Family includes Richard Sackler, Jonathan Sackler, David Sackler, and the estate of the late Beverly Sackler.

³ “Private Insurance Class Claimants” and “Private Insurance Plaintiffs” have the same meanings as in the Statement and Application.

Dated: April 30, 2020
New York, New York

Respectfully submitted,

/s/ Gerard Uzzi

Gerard Uzzi

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